

OBJECTION TO SSD - 41680467- EDEN 1, AQUA-CULTURAL LEASE, DISASTER BAY, NSW

OUT OF STEP WITH CURRENT OCEAN CARE BEST PRACTICE

As foreshadowed by Chris Ritchie, Director Industry Assessments (as delegate for the Planning Secretary) in the SSD- 41680467, Eden 1 SEARs Extension - Cover Letter - 16 May 2024:

‘While the government authorities have not raised any concerns regarding the extension of time, the Department considers **an extension of two years is not appropriate in this instance, noting the seaweed aquaculture industry is in its infancy in NSW.**’

Therefore the one year extension was granted to AusKelp for their 200 Hectare kelp farm in Disaster Bay on May 16, 2024 then with no real explanation the extra year was granted two months later on 12 July 2024. Ocean protection and science has changed radically since the SEAR document for the project was compiled in May 2022.

2025 was the unofficial ‘Year of the Ocean’ with a global focus on Ocean protection. Oceans were identified as being able to mitigate the Climate Crisis. David Attenborough’s documentary, *Ocean* (released May 2025) and two major symposia, the *Grimaldi Forum* (Monte Carlo, June 2025) and *UN Ocean Conference* (Nice, June 2025) clearly illuminate the heavy impact and ecosystem intervention of the proposed ‘Eden 1’, whose location is in the only remaining NSW coastal wilderness. All current scientific thinking is to minimise intervention in the oceans, and maintain wild areas:

"The ocean can bounce back to life. If left alone, it may not just recover but thrive beyond anything anyone alive has ever seen". David Attenborough, 2025

2025 also saw a major push for a global plastics treaty by the UN. Australia was a leader in these intergovernmental negotiations and continues to push for a robust global plastics treaty that addresses the full life cycle of plastics, the "triple planetary crisis" of climate change, pollution, and biodiversity loss.

The High Seas Treaty, or Biodiversity Beyond National Jurisdictions (BBNJ) Agreement, officially came into force on January 17, 2026, creating the first legally binding framework to protect marine life in international waters. It covers two-thirds of the ocean, aiming to establish Marine Protected Areas (MPAs), regulate deep-sea mining, and protect against pollution. On March 31 2026 the Australian Federal Parliament passed the High Seas Biodiversity Bill, enabling our country to officially ratify the landmark UN High Seas Treaty to protect marine life in international waters. Australia, a key negotiator of the treaty, will now join over 60 nations in safeguarding 30% of the world's oceans by 2030.

Clearly globally the aim is to reverse and mitigate microplastics and nanoplastics in the ocean yet the ‘Eden 1’ proposal, at capacity, will place 24,200 plastic based floats and over 1135 km of polymer based ropes in extremely rough waters, potentially releasing

billions of microplastics and nanoplastics, through friction shedding (and during harvesting), into Disaster Bay's pristine waters. These pollutants will go directly into the food chain being consumed by fish and therefore humans. There are studies that identify that kelp itself absorbs these micro and nanoplastics from the plastic infrastructure upon which they grow. In this case if the kelp is to be used as fertiliser or for human consumption the microplastics will be spread further into the food chain. <https://pubmed.ncbi.nlm.nih.gov/38824984/>

There are alternatives. In 2022 the Port Phillip Bay Golden Kelp Restoration Project developed successful techniques to cultivate golden kelp from the microscopic life stage on **twine and gravel, with no plastic involved**. This is true conservation and reforestation of kelp where kelp had been growing and is a natural part of the sea landscape, not where no kelp exists currently as is the case in the proposed location of 'Eden 1' <https://www.bluecarbonlab.org/kelp-restoration/>

The argument by the proponent that 'Eden 1' will be on Ocean desert is misleading. Naturally occurring *Deserted Oceans* are crucial for global climate regulation, acting as carbon sinks, influencing weather patterns by storing and distributing heat. Perhaps most importantly they support unique, adapted biodiversity. These areas are totally distinct from human-caused *Ocean Desert*: 'dead zones' caused by dredging and over fishing. This distinction is on public display on the information board at Greenglades, which clearly states the ocean at this unique location is *Deserted Ocean* yet AusKelp continually argue that the 200 hectares is on barren seabed. Shadowing via the farm's ropes, buoys and the kelp itself will impact the natural balance of light to these biomes.

At capacity 'Eden 1' will be a 200 hectare monoculture of Golden Kelp (*Ecklonia radiata*). This homogeneity presents biodiversity challenges and arguably a higher risk of susceptibility towards disease. The farm's service vessels will be travelling from Twofold Bay, 34km away. The port is a busy one with visiting pleasure crafts and cruise ships using the facilities. Often foreign species are to be found in ballast of such vessels. As Golden Kelp is endemic to the area any diseases within the lease area would be devastating to the surrounding local kelp population.

COMMUNITY CONSULTATION

There has been a total lack of transparent, meaningful engagement with the residents of Wonboyn, North Wonboyn and Narrabarba concerning 'Eden 1'

There was no consultation at all with the community with regard to the kelp test site in Disaster Bay. Indeed on 30 March, 2024 a local NSWNP ranger saw the buoys at the site and called the Fisheries Department, concerned it was an illegal enterprise only to be told a licence had been granted from Fisheries.

Prior to July 6, 2025, there had been NO conversations concerning the size and location of 'Eden 1' with Eden Local Aboriginal Land Council, NSWNP Merimbula branch, local Tourism Operators, most of the oyster farmers and most residents, ratepayers and repeat national and international visitors.

The poorly advertised, 'Drop-in' information session in September 2023 was conducted during work hours, on a week day, out of holiday season, when the population of Wonboyn is at its lowest. Only 5 people attended, two of whom were paid by a local oyster farmer to attend. The session was labeled 'Join our upcoming community sessions

on regenerative farming off NSW coast', '...this research alongside AusKelp, a company aiming to develop a kelp farm in the EDEN Area'. This gave no indication that the project was local to Wonboyn or that this meeting constituted community consultation for the proposed Eden 1 project.

The 'research' mentioned was conducted by The Blue Economy CRC in partnership with the University of Wollongong. In the resulting report *Exploring Opportunities for regenerative Aquaculture on the NSW South Coast*, the Wonboyn 'drop-in' session is not even mentioned. In the social impact section of the report only ONE public interview with a Wonboyn resident is listed as having taken place.

A key finding of this 2024 report vis a vis location of such ventures is: '....that site selection is conducted in partnership with existing ocean users such as fishers and tourism operators, local communities, and especially First Nations and Native Title applicants'. (Summary Report, page 2). In the case of "Eden 1" this did not occur in Wonboyn, the residential area closest to the proposed site.

Kelli White from the Planning Office of BVSC confirmed that the 'drop-in' session was not advertised on the Council News page which is where such events would normally be posted.

As the project was called 'Eden 1' and Wonboyn was only afforded a 'Drop in' session rather than a full information session (as in Eden) there was no indication that the project would actually be located in our backyard let alone adjacent to Nadgee Nature Reserve, a renowned flora and fauna conservation area. Eden is in fact 34km away from the proposed 'Eden 1' site. The carbon footprint and noise pollution (above and below the water line) from the maintenance diesel boats will further impact the site and this draws attention to the 'greenwashing' of a project whose environmental damage will far outweigh any prescribed benefits.

In early July, 2025 the proponent was contacted by community individuals and informed that the majority of the Wonboyn Lake Village was unaware of the the size and location of the proposed Eden 1' kelp farm. The proponent indicated that they had fulfilled their obligation to the community. A local community group then negotiated and facilitated an information session which occurred on October 22 of the same year. The recording of this Information Session is on line and clearly reveals many contradiction between the information on the proponent's website and the information presented on the day.

The guidelines for community consultation outlined by International Association for Public Participation (IPA) show 'Information Sessions' at the low end of the spectrum with Engagement and Empowerment at the high end. None of the latter occurred in this instance. In his SEARs cover letter, dated May 23, 2022, Chris Ritchie, Director Industry Assessments (as delegate for the Planning Secretary) prioritises Community Consultation and emphasised (underlined and in bold) '**Please note, the Department will require clear evidence that this consultation has been undertaken and justification for the proposed consultation method(s) used**' (SEARs cover letter Page 1) On this point alone the project should not go ahead.

VISUAL AMENITY

Thousands of national and international visitors come to Wonboyn each year for the natural, pristine beauty of Nadgee Nature Reserve and Boewa National Park. The two

nature areas bookend Disaster Bay. The Disaster Bay Lookout, at the NSWNP Park Permit Station for Boewia NP, is an internationally renowned photo opportunity. The NSWNP encourage people to take photos to record and document the natural beauty and surrounds. To mar this view would be a travesty and would irrevocably damage international standing of the region as an eco tourism destination.

<https://www.nationalparks.nsw.gov.au/things-to-do/lookouts/disaster-bay-lookout>

Similarly how unthinkable is it that the internationally renown 55 km Nadgee Wilderness Walk, from Merrica River to Mallacoota, would start with the view of the manmade 200 hectare kelp farm being serviced by noisy sea vessels. **‘The natural beauty of Nadgee nature reserve has been preserved for centuries, allowing visitors to explore, bush walk, birdwatch and swim in a pristine coastal landscape.’**

<https://www.nationalparks.nsw.gov.au/visit-a-park/parks/nadgee-nature-reserve/>

SANCTUARY & MENTAL HEALTH

Wonboyn is a sanctuary for humans as well as fauna and flora. The peacefulness and tranquility is something that many people travel from far and wide to experience. It is indisputable that at least 3000 generations of families would have inhabited this area, there are middens to prove this, and the abundance of food, protection and pleasurable pastimes make this location an obvious paradise for human habitation.

The mental health of young people is in crisis world wide (wfpha.org). Impacts of covid, anxiety about climate change (eco trauma) and in Wonboyn’s case the devastating bushfires of 2020. Time spent in nature has been shown to help elevate stress and anxiety. In 2025 researchers at the University of Melbourne evaluated a ‘People and Parks’ program called ‘Nature prescriptions’. Health practitioners prescribed structured, group-based nature activities in conjunction with, or as an alternative to, medications. The results support that nature has an overwhelmingly positive contribution to make towards the mitigation of the mental issues in young people. National Parks and Nature Reserves play a profound role in providing people with sanctuary, relaxation and healing. The location of ‘Eden 1’ is adjacent to the last coastal wilderness in NSW. As such it should remain pristine to be enjoyed by all. <https://peopleandparks.org/>

Disaster Bay is the last coastal wilderness in NSW. As a location for a 200 hectare monoculture kelp farm, “Eden 1” is out of step with current scientific knowledge and Ocean care best practice. It is an area that provides sanctuary for marine and terrestrial life alike. We owe it to future generations to offer protection and acknowledgement to this uniquely precious place for the vital role it plays in the bio-health of the entire region.